

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LORIE DUFF	§	
Plaintiff,	§	
	§	Case No. 4:20-CV-03430
v.	§	
	§	
FRONTIER AIRLINES, INC. AND	§	
ABM AVIATION, INC.	§	JURY DEMANDED
Defendants.	§	

**DEFENDANT DAL GLOBAL SERVICES, LLC’S
Rule 26 INITIAL DISCLOSURES**

COMES NOW, Defendant, DAL Global Services, LLC (“DAL Global”), and pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, serves these their Initial Disclosures. DAL Global reserves the right to amend its disclosures to reflect additional information as such becomes available in the course of discovery and their investigation, as required under Rule 26 of the Federal Rules of Civil Procedure. DAL Global adopts all other parties’ disclosures (without stipulating to a witness’s alleged expertise) as if fully restated herein.

- A.** The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Response:

1. Lorie Duff
c/o Kevin Forseberg, Esq.
The Forseberg Law Firm, P.C.
15899 Hwy 105 West
Montgomery, Texas 77356
936-588-6226

Lorie Duff is the plaintiff in this lawsuit. She may have information regarding the facts in this lawsuit.

2. Frontier Airlines, Inc.
and/or its employee(s), custodian of records, and corporate representative(s)
c/o Patrick J. Comerford
Rigby Slack Lawrence Berger Akin Pepper & Comerford PLLC
3500 Jefferson Street, Suite 330
Austin, Texas 78731
512-782-2060

Frontier Airlines, Inc. is a defendant in this lawsuit. Its' employee(s), custodian of records and/or corporate representative(s) may have information regarding the facts in this lawsuit.

3. ABM Aviation, Inc.
and/or its employee(s), custodian of records, and corporate representative(s)
c/o Marc Michael Rose
Rose Law Group, PLLC
777 Main Street, Suite 600
Fort Worth, Texas 76102
817-887-8118

ABM Aviation, Inc. is a defendant in this lawsuit. Its' employee(s), custodian of records and/or corporate representative(s) may have information regarding the facts in this lawsuit.

4. DAL Global Services, LLC
and/or its employee(s), custodian of records, and corporate representative(s)
c/o Robert M. Browning
Brown Sims
1177 West Loop South, 10th Floor
Houston, Texas 77027
713-629-1850

DAL Global Services, LLC is a defendant in this lawsuit. Its' employee(s), custodian of records and/or corporate representative(s) may have information regarding the facts in this lawsuit.

5. Maria Vargas
Samantha Craig
Leonardo Ojeda
Marcus Carter
Shawnya Williams
c/o Robert M. Browning
Brown Sims
1177 West Loop South, 10th Floor

Houston, Texas 77027
713-629-1850

Past and current employees of DAL Global Services, LLC who may have information regarding the facts in this lawsuit.

6. Aylancia Lillie
1015 Hummingbird Point Lane
Houston, Texas 77090
346-316-5301

Ms. Lillie was a Customer Care Agent for ABM Aviation, Inc. She may have knowledge regarding the incident.

7. Misty Cannon
1301 Lakeland Drive, Apt. 205
Liberty, Texas 77575
936-346-2515

Ms. Cannon was a Customer Care Supervisor for ABM Aviation, Inc. She may have knowledge regarding the incident.

8. George Bush International Airport
and/or its employee(s), custodian of records, and corporate representative(s)
2800 North Terminal Road
Houston, Texas 77032
281-230-3100

Premises where incident occurred. Its' employee(s), custodian of records and/or corporate representative(s) may have information regarding the facts in this lawsuit.

9. Houston Fire Department/City of Houston EMS
and/or its employee(s) and custodian of records
P.O. Box 4945
Houston, Texas 77210
877-659-0481

Medical provider identified by Ms. Duff who may have knowledge regarding the alleged injuries sustained from the incident.

10. Memorial Hermann Northeast Hospital
and/or its employee(s) and custodian of records
18951 North Memorial Drive
Humble, Texas 77338
281-540-7700

Medical provider identified by Ms. Duff who may have knowledge regarding the alleged injuries sustained from the incident.

11. *Miller Chiropractic*
and/or its employee(s) and custodian of records
3504 West Davis Street
Conroe, Texas 77304
936-788-6565

Medical provider identified by Ms. Duff who may have knowledge regarding the alleged injuries sustained from the incident.

12. *Houston MRI & Diagnostic Imaging*
and/or its employee(s) and custodian of records
9990 Richmond Avenue, Suite 110
Houston, Texas 77042
713-239-2309

Medical provider identified by Ms. Duff who may have knowledge regarding the alleged injuries sustained from the incident.

13. *Texas Center for Neuroscience*
and/or its employee(s) and custodian of records
1900 North Loop West, Suite 240
Houston, Texas 77027
713-239-2309

Medical provider identified by Ms. Duff who may have knowledge regarding the alleged injuries sustained from the incident.

14. *Houston Spine & Rehabilitation Centers*
and/or its employee(s) and custodian of records
3101 College Park Drive
The Woodlands, Texas 77384
281-205-0317

Medical provider identified by Ms. Duff who may have knowledge regarding the alleged injuries sustained from the incident.

15. *Signature RX*
and/or its employee(s) and custodian of records
9434 Katy Freeway, #410
Houston, Texas 77055
713-275-2589

Medical provider identified by Ms. Duff who may have knowledge regarding the alleged injuries sustained from the incident.

16. *Northstar Doc*

and/or its employee(s) and custodian of records
2302 Fannin, #410
Houston, Texas 77002
855-568-5629

Medical provider identified by Ms. Duff who may have knowledge regarding the alleged injuries sustained from the incident.

17. *Horizon Pain Management*

and/or its employee(s) and custodian of records
6535 FM 2920
Spring, Texas 77379
832-442-3479

Medical provider identified by Ms. Duff who may have knowledge regarding the alleged injuries sustained from the incident.

DAL Global reserves the right to amend to supplement. DAL Global further cross-designate any witness identified by any other party in this litigation.

- B.** A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Response:

- *Photographs of the incident;*
- *Written statements by witnesses; and*
- *Defendant's Insurance Policy.*

Defendant reserves the right to amend or supplement its Disclosures.

- C.** A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Response:

Defendant disputes Plaintiff's calculation of damages.

Defendant reserves the right to amend or supplement its Disclosures.

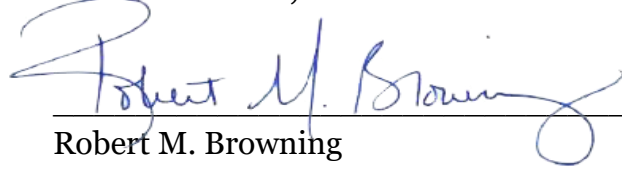
- D.** For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Response:

See responsive documents attached.

Respectfully submitted,

BROWN SIMS, P.C.

A handwritten signature in blue ink, reading "Robert M. Browning", is written over a horizontal line.

Robert M. Browning

Texas Bar No. 00796264

Fed. ID No. 21097

1177 West Loop South, Tenth Floor

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**ATTORNEY-IN-CHARGE FOR
DEFENDANT DAL GLOBAL
SERVICES, LLC**

OF COUNSEL:

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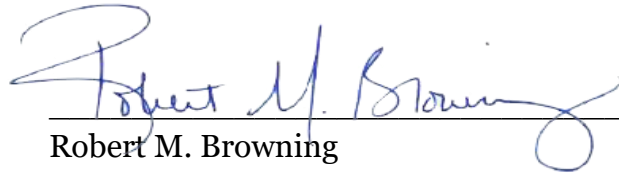
Fax: (713) 629-5027

aschackel@brownsims.com

**ATTORNEY FOR DEFENDANT
DAL GLOBAL SERVICES, LLC**

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing was on this the 1st day of June, 2021 in accordance with the Federal Rules of Civil Procedure.


Robert M. Browning